

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 7/18/2023

July 17, 2023

VIA ECF

The Honorable Sarah J. Netburn
United States Magistrate Judge
U.S. District Court for the Southern District of New York
Thurgood Marshall U.S. Courthouse, Room 430
40 Foley Square
New York, New York 10007

In re Terrorist Attacks on September 11, 2001, Case No. 1:03-md-1570-GBD-SN (S.D.N.Y.)

Dear Judge Netburn:

In accordance with this Court's Orders entered June 28, 2023 (ECF No. 9171) and July 11, 2023 (ECF No. 9210), Al Rajhi Bank and Plaintiffs with claims against the Bank write to jointly update the Court on their meet-and-confer discussions and their proposed schedule for the remainder of limited jurisdictional discovery.

1. Remaining Schedule for Jurisdictional Fact and Expert Discovery

The Parties are in agreement on a modified schedule for completion of jurisdictional fact and expert discovery. The Parties agree as follows:

- Fact discovery in accordance with this Court's July 11, 2023 Order (ECF No. 9210) shall be completed by September 1, 2023.
- Plaintiffs shall serve their expert disclosures and affirmative reports by October 4, 2023.
- The Bank shall serve its expert disclosures and rebuttal reports by November 22, 2023.
- Expert discovery shall be completed by December 20, 2023.
- Plaintiffs shall submit a statement of the facts and evidence on which they will rely in meeting their burden to establish personal jurisdiction over the Bank, in accordance with this Court's May 9, 2023 Order (ECF No. 9077), by January 19, 2024.

The Parties reserve all rights including with respect to any objections to the July 11, 2023 Order.

The Honorable Sarah J. Netburn
July 17, 2023

WHITE & CASE

2. Al Rajhi Bank's Motion to Compel

The Parties continue to meet and confer on the Bank's Motion to Compel (ECF No. 9002), and propose that the Parties file a joint letter to the Court outlining any remaining disputes by Friday, July 21, 2023.

Respectfully submitted,

/s/ Nicole Erb

Christopher M. Curran
Nicole Erb
Reuben J. Sequeira
Michael Mahaffey
Counsel for Al Rajhi Bank

The parties' request is GRANTED. Jurisdictional discovery shall proceed on the schedule outlined in this letter. The parties will submit a joint letter discussing outstanding disputes with respect to Al Rajhi Bank's Motion to Compel by July 21, 2023.

SO ORDERED.


SARAH NETBURN
United States Magistrate Judge

Dated: July 18, 2023
New York, New York